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Federal Communications Commission  
Office of the Secretary

November 15, 2007

**BY HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
c/o Natek, Inc.  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, DC 20002

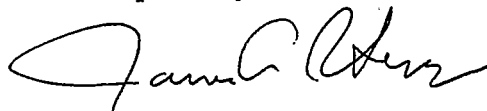
Re: *Seventh Report and Order on Advanced Television Systems*, MB Docket No. 87-268  
Reply of Corridor Television, LLP, Licensee of KCWX, Fredericksburg, Texas to  
Opposition to Petition for Reconsideration

Dear Ms. Dortch:

Transmitted herewith on behalf of Corridor Television, LLP, licensee of television station KCWX, Fredericksburg, Texas, Facility ID 24316, are the original and four copies of a Reply to an Opposition to the Petition for Reconsideration filed by Corridor with respect to the *Seventh Report and Order on Advanced Television Systems*, MB Docket No. 87-268.

Should additional information be necessary in connection with this matter, kindly communicate directly with the undersigned.

Respectfully submitted,



James A. Stenger

Encl.

DC #350726 v1

Before the  
Federal Communications Commission  
Washington, DC 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of )

Advanced Television Systems )  
and Their Impact upon the )  
Existing Television Broadcast )  
Service )

MB Docket No. 87-268

To: The Commission

**Reply of Corridor Television LLP, Licensee of KCWX, Fredericksburg, Texas  
to Opposition of Alamo Public Telecommunications Council  
To Petition for Reconsideration of the Seventh Report and Order**

Corridor Television LLP ("Corridor"), licensee of television station KCWX, analog Channel 2, Facility Id. 24316, Fredericksburg, Texas, through its undersigned counsel and pursuant to Section 1.106(h) of the Commission's Rules, hereby replies to the Opposition of Alamo Public Telecommunications Council ("Alamo") to the Corridor petition for reconsideration filed on October 2, 2007, and in support hereof respectfully shows as follows.

Alamo is the licensee of non-commercial educational station KLRN that has been assigned TCD 9 for DTV operation. Alamo has no reasonable basis to reject the compromise proposal submitted by Corridor.<sup>1</sup> The assertion that the Corridor compromise proposal will still cause impermissible interference to KLRN is incorrect. As shown in the Engineering Study submitted by Corridor, the Corridor proposal will cause only 0.35 percent interference to KLRN. This equates to *zero* interference under the Commission's rounding methodology that has been in effect for DTV since 1998.<sup>2</sup>

Section 1.429(b) of the rules states that petitions for reconsideration are to be based upon changes in circumstances. The proposal of Corridor to accept a TCD on channel 8 with reduced

<sup>1</sup> Alamo's Opposition and certificate of service are dated June 27, 2007. The pleading was served on counsel for Corridor in an envelope with a post-mark of November 6, 2007.

<sup>2</sup> *Third Periodic Review*, MB Docket No. 07-9, DA 07-3518 (August 6, 2007) at paras. 104-106.

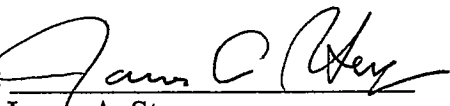
*facilities is a change in circumstances and the Commission has encouraged parties to attempt to reach agreements to resolve interference conflicts.*

It is unfortunate that KLRN has not been willing to agree to a compromise proposal that would cause less than 0.5 percent interference KLRN, a *de minimus* level of *predicted* interference that the Commission consistently has said amounts to *zero* interference, given the limits of the Commission's interference prediction methodology.<sup>3</sup> Under the circumstances, Corridor has been left with no choice other than to continue to pursue its waiver request, a request that is fully consistent with the Commission's longstanding position that interference levels of less than 0.5 percent are equivalent to *zero* interference.<sup>4</sup>

Wherefore, for the foregoing reasons, Corridor respectfully requests that the Commission reconsider the *Seventh Report and Order* only to the limited extent requested herein, change the TCD of KCWX, Fredericksburg, Texas to channel 8 with 15 kW non-directional ERP at 413 meters HAAT, and grant a temporary, *de minimus* waiver or find that a waiver is unnecessary.

Respectfully submitted,

**Corridor Television LLP**

By:   
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Washington, D.C. 20001  
(202) 508-4308

Its Counsel

Dated: November 15, 2007

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

**CERTIFICATE OF SERVICE**

I, Roberta Muscarella, hereby certify that on November 15, 2007, I served a copy of the foregoing Reply to Opposition to Petition for Reconsideration by first class mail, postage prepaid on the following:

Molly Pauker, Esq.  
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Counsel to Channel 9, KLRN-DT

  
Roberta Muscarella